

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF TEXAS  
HOUSTON DIVISION**

**WILLIAM M. TURNER, III, on behalf of  
himself and all others similarly situated,**

**Plaintiff,**

**VERSUS**

**NINE ENERGY SERVICE, INC., et al.**

**Defendants.**

**CIVIL ACTION NO. 4:15-CV-03670**

**UNOPPOSED MOTION TO WITHDRAW  
AND SUBSTITUTE COUNSEL OF RECORD**

NOW INTO COURT, through undersigned counsel, comes Nine Energy Service, LLC (“Defendant”) who respectfully moves this court for an order allowing the withdrawal of L. Ashley Bynum, formerly of the firm of Jones Walker LLP, as counsel of record in the above-captioned matter. In support of this motion, Defendant submits that Ms. Bynum is no longer a member of Jones Walker LLP, effective April 8, 2016, and this motion is being filed with her consent. Jennifer L. Anderson of Jones Walker LLP will remain lead counsel of record in this matter.

Defendant further requests that Jason A. Culotta and Stephanie M. Gilliam, of the firm of Jones Walker, LLP, be substituted as counsel of record. Movant certifies that Mr. Culotta and Ms. Gilliam are admitted to practice law before this Honorable Court and in good standing. Their respective contact information is reflected in the signature blocks below.

Movant further certifies that this substitution of counsel of record will not delay the progress of this litigation.

Finally, in accordance with Local Rule 7 and Section 5 of this Court's Procedures, counsel have conferred in good faith regarding this motion to withdraw and substitute counsel, and Plaintiffs do not oppose this motion.

**WHEREFORE**, Nine Energy Service, LLC respectfully requests that this motion be granted, that L. Ashley Bynum be permitted to withdraw as counsel of record for Nine Energy Service, LLC, and that Jason A. Culotta and Stephanie M. Gilliam be substituted as counsel of record for Defendant Nine Energy Service, LLC in this matter.

Respectfully submitted,

s/ Jennifer L. Anderson

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Jennifer L. Anderson  
Attorney-In-Charge  
(TX Bar No. 24047796; Federal ID 34754)  
Jones Walker LLP  
Four United Plaza  
8555 United Plaza Boulevard  
Baton Rouge, Louisiana 70809  
Telephone: (225) 248-2040  
Facsimile: (225) 248-3040  
E-mail: [janderson@joneswalker.com](mailto:janderson@joneswalker.com)

and

Christopher S. Mann  
(TX Bar No. 24061563; Federal ID 605320)  
Jones Walker LLP  
201 St. Charles Avenue  
New Orleans, LA 70170-5100  
Telephone: (504) 582-8332  
Facsimile: (504) 589-8332  
E-mail: [cmann@joneswalker.com](mailto:cmann@joneswalker.com)

and

s/ L. Ashley Bynum (with permission)

L. Ashley Bynum  
(Federal ID No. 2191251)  
9944 Oliphant Road  
Baton Rouge, LA 70809

and

s/ Jason A. Culotta

Jason A. Culotta  
(Federal ID No. 2859054)  
Jones Walker LLP  
201 St. Charles Avenue  
New Orleans, LA 70170-5100  
Telephone: (504) 582-8177  
Facsimile: (504) 589-8177  
E-mail: [jculotta@joneswalker.com](mailto:jculotta@joneswalker.com)

and

s/ Stephanie M. Gilliam

Stephanie M. Gilliam  
(TX Bar No. 24083071; Federal ID 1829598)  
Jones Walker LLP  
Four United Plaza  
8555 United Plaza Boulevard  
Baton Rouge, LA 70809  
Telephone: (225) 248-2082  
Facsimile: (225) 248-3082  
E-mail: [sgilliam@joneswalker.com](mailto:sgilliam@joneswalker.com)

***Attorneys for Defendants, Nine Energy Service,  
Inc. and CDK Perforating, LLC***

**CERTIFICATE OF SERVICE**

I hereby certify that on \_\_\_\_\_, a copy of the foregoing was filed electronically using the Court's CM/ECF system and served in accordance with the Federal Rules of Civil Procedure. Notice of this filing will be sent by e-mail to all parties by operation of the Court's electronic filing system or by mail to anyone unable to accept electronic filing.

s/ Jennifer L. Anderson  
Jennifer L. Anderson

**CERTIFICATE OF CONFERENCE**

Pursuant to Local Rule 7 and Section 5 of this Court's Procedures, Defendants certify that they conferred with counsel for Plaintiff concerning this motion in advance of bringing this issue before the Court.

s/ Jennifer L. Anderson  
Jennifer L. Anderson